

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Criminal No. 20-20520

Plaintiff,

HON. JUDITH E. LEVY

vs.

D-1 BRANDON COLEMAN,  
D-2 RAY-SOHN DOUGLASS,  
D-3 GREGORY YOUNG JR.,  
D-5 JAYQUAN COLEMAN,  
D-6 MAX WASHINGTON,  
D-7 LARON DAVIS,

Defendants.

**AGREED MOTION FOR DISCOVERY PROTECTIVE ORDER**

The United States and counsel for the defendants file this motion for entry of a Discovery Protective Order.<sup>1</sup>

Defendants are charged in an indictment with various charges related to conspiracies to distribute controlled substances, as well as firearms violations, in violation of 21 U.S.C. §§ 841(a)(1) and 846; and 18 U.S.C. §§ 922(g) and 924(c).

Part of the discovery materials the government intends to produce pursuant to its discovery obligations under Federal Rule of Criminal Procedure 16 include

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<sup>1</sup> Ramone Martin, who is also charged in the Indictment, remains a fugitive and is therefore not a party to this Motion.

electronic video recordings of controlled drug purchases conducted by an undercover agent and/or confidential informant (hereinafter referred to as “discovery materials”). The dissemination of these discovery materials could seriously jeopardize the safety of the undercover agent and confidential informant as well as additional investigations in which they are involved.

The government therefore requests that the Court enter a Discovery Protective Order prohibiting the defendants from disseminating the discovery materials identified herein to anyone other than counsel and members of the defendants’ litigation and investigative teams. As proposed in the attached Protective Order, defense counsel and the defendants’ litigation teams may show and display the discovery materials to the defendants, but may not provide a copy of the discovery materials to the defendants or third parties to keep and maintain in their possession. Further, defense counsel and the defendants’ litigation teams shall return the discovery materials to the United States Attorney’s Office within 10 days upon conclusion of the case before this Court, or, if an appeal is taken, upon completion of such an appeal.

Any discovery materials that are filed with the Court in connection with pre-trial motions, trial, sentencing, or other matter before this Court, shall be filed under seal and shall remain sealed until otherwise ordered by this Court. This does not entitle either party to seal their filings as a matter of course. The parties are required to comply in all respects to the relevant local and federal rules of criminal procedure

pertaining to the sealing of court documents.

Any violation of any term or condition of the Proposed Order by the defendants, the defendants' attorneys of record, any member of the defense teams, or any attorney for the United States Attorney's Office for the Eastern District of Michigan, may be sanctioned by contempt of court, and/or may be subject to monetary or other sanctions as deemed appropriate by this Court.

This Motion and the proposed Protective Order is submitted for the purpose of insuring that law enforcement sensitive information contained in discovery materials are not disseminated to third parties.

For these reasons, the United States and Defendants request this Court to authorize the proposed Discovery Protective Order.

**IT IS SO STIPULATED.**

Respectfully submitted,  
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Dated: December 7, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that on December 7, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel and parties authorized to receive electronically Notices of Electronic Filing.

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